



DAVID M. ESKEW

(646) 970-7342 (direct dial)
deskew@aellaw.com
aellaw.com

**256 Fifth Avenue, 5th Floor
New York, New York 10001**

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By ECF

The Honorable Hector Gonzalez
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: U.S. v. Chi Kwan Wong, Crim. No. 23-00088 (HG)

Dear Judge Gonzalez:

We write on behalf of defendant Chi Wong to request the return of his passport. On October 16, 2024, Your Honor sentenced Chi to a two-year term of probation for conspiracy to commit healthcare fraud in violation of 18 U.S.C. § 1349. *See* Judgment (ECF #48). The first six months of probation are to be served by home incarceration, which began on November 4, 2024. *Id.* at 4.

Prior to his sentencing in this matter, Chi was supervised by U.S. Pretrial Services, and as part of that supervision, he surrendered his passport to Pretrial. Pretrial requires a court order to return a surrendered travel document to a defendant or transfer it to the U.S. Probation Office. Accordingly, and because Chi is currently on home incarceration, we request that Your Honor order the transfer of Chi's passport to the U.S. Probation Office so that his probation officer can return it to Chi.

We thank the Court for its attention to this request.

Respectfully submitted,

Abell Eskew Landau LLP

/s/ David M. Eskew
By: David M. Eskew
Counsel for Defendant